

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Newport News Division**

KEVIN REAGAN,

Plaintiff,

v.

JOHN RATCLIFFE, Director,
Central Intelligence Agency,

Defendant.

Civil Action No. 4:23-cv-158

**PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION TO DISMISS
PLAINTIFF'S AMENDED COMPLAINT¹**

Plaintiff Kevin Reagan, by and through undersigned counsel, hereby opposes Defendant's Motion to Dismiss Plaintiff's Amended Complaint (Dkt. 61) and requests that this Court deny Defendant's Motion in its entirety, for the reasons articulated in Plaintiff's Memorandum of Points and Authorities in Opposition to Defendant's Motion to Dismiss Plaintiff's Amended Complaint, which is attached hereto and incorporated herewith.

Dated: July 28, 2025

Respectfully submitted,

/s/ LENORE C. GARON

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¹ Per the Court's Order (Dkt. 23), Plaintiff submitted to Defendant's Prepublication Classification Review Board (PCRB) his Opposition to Defendant's Motion to Dismiss his Amended Complaint, together with a Memorandum of Points and Authorities in Opposition and a proposed Order on July 17, 2025. On July 25, 2025, the PCRB communicated that no classified information was identified and no changes are required for publication, and therefore, Complainant is filing his Opposition after gaining approval from the PCRB.

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Attorney for Plaintiff

/s/ DANIEL K. GEBHARDT

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Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Plaintiff's Opposition to Defendant's Motion to Dismiss Plaintiff's Amended Complaint, and a proposed order, were served on this 28th day of July 2025 via electronic filing using this Court's CM/ECF system, on Defendant:

Daniel P. Shean, Assistant U.S. Attorney
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/s/ Lenore C. Garon

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